## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

ERIK PRINCE,

Plaintiff,

V.

THE INTERCEPT, a New York company, FIRST LOOK MEDIA WORKS, INC., a Delaware corporation, MATTHEW COLE, an individual, and ALEX EMMONS, an individual,

Defendants.

No. 20-cv-84-ABJ-KHR

## SECOND DECLARATION OF ERIK PRINCE

Pursuant to 28 U.S.C. § 1746, I, Erik Prince, declare as follows:

- 1. I am the Plaintiff in this action. I submit this declaration to correct two errors in my prior declaration, filed on September 16, 2020 (ECF No. 23-1), which came to my attention after its filing.
- 2. In my first declaration, I wrote that "I have been registered to vote in Wyoming since 2017." I believed that to be true at the time that I signed my declaration, but I have since come to learn that I was mistaken. In 2017, I obtained a Wyoming driver's license and believed that I had registered to vote at that time. I did not vote in the off-year elections, and intended to vote in Wyoming this year. When I went to cast my early vote last month, I learned that I was not registered. I immediately registered to vote in Wyoming, and cast my 2020 ballot in Wyoming. To be clear, I did not vote in any other state between 2017 and the present. (I was also registered to vote in Wyoming in the 90s through in or about 2002.)

In my first declaration, I also misidentified the names of two entities that I own 3. (Jones Creek and CMNS), which I said were registered to my Wyoming address. I should have identified, for example, Moyock Medical Supplies LLC, which is an entity that I own that is registered to my Wyoming address. At the time I signed my declaration I believed Jones Creek and CMNS to be Wyoming entities, but I have subsequently learned that they are not; I believe they are Delaware entities. As set forth in my first declaration, however, it is accurate that I conduct business on behalf of my various business entities from Wyoming, regardless of where the entities are legally formed.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October <u>20</u>2020 \_\_, New York

Erik Prince Palo Alto CA